



VENABLE LLP | 1290 AVENUE OF THE AMERICAS  
20TH FLOOR | NEW YORK, NY 10104  
T +1 212.218.2100 F +1 212.218.2200 Venable.com

September 23, 2021

T 212.503.0665  
F 212.218.2200  
BPArgyle@Venable.com

**VIA ECF ONLY**

The Honorable John P. Cronan  
United States District Court for the Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, New York 10007

**Re: Jacobs Project Mgmt. Co. v. The Travelers Indemn. Co., Case No. 1:21-cv-4101**  
**Second Request to Adjourn Initial Pretrial Conference and Associated Deadlines**

Dear Judge Cronan:

Venable represents Plaintiff Jacobs Project Management Co. in the action referenced above. Defendant The Travelers Indemnity Company is represented by Joanne Engeldrum, Esq., Rivkin Radler LLP. Third-Party Defendant Harleysville Insurance Company has not yet been served or appeared in this action.

On June 18, 2021, I wrote to the Court to report that the parties have reached an agreement in principle to settle this lawsuit, and to request an adjournment of the Initial Conference and associated deadlines. *See* ECF No. 12. The Court granted the request and adjourned the Initial Conference to August 2, 2021. *See* ECF No. 13. The Court subsequently adjourned the Initial Conference again, to September 27, 2021. *See* ECF No. 15.

I am pleased to report that the parties' settlement agreements are now fully executed. Counsel are now just waiting on confirmation of payment before filing a Stipulation of Discontinuance. All parties respectfully request that the Court further adjourn the Initial Conference currently scheduled for September 27, 2021, to a time of the Court's choosing. The parties respectfully suggest that an adjournment of 30 days should be more than sufficient time for the final steps in the settlement process to be completed. All parties join in this request.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

Benjamin P. Argyle

cc: Michael J. O'Connor, Esq., Venable LLP (*pro hac vice* forthcoming)  
Joanne Engeldrum, Esq., Rivkin Radler LLP, *Attorneys for Defendant*  
Arthur McQuillan, Esq., Nationwide/Harleysville (via email only)

This request is granted. The IPTC scheduled for September 27, 2021, at 11:00 a.m. is adjourned to October 28, 2021, at 10:00 a.m.

SO ORDERED.

Date: September 24, 2021  
New York, New York

  
JOHN P. CRONAN  
United States District Judge